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ABSTRACT

This report to Congress presents results of a survey of the 103 historically black colleges and universities (HBCUs) concerning the number of historic properties located at HBCUs and the estimated cost to restore and preserve these properties. About half of the schools responded to the survey. Results indicated that: (1) respondents identified 712 historic properties owned by the schools, of which half were already on the National Register of Historic Places; (2) 66 percent of the historic properties were located at 28 schools; (3) buildings were the most common type of historic property identified; and (4) an estimated $755 million is needed to restore and preserve all 712 properties. These cost estimates include only capital improvement costs and not routine maintenance. Responding schools used various methods to calculate the estimated restoration and preservation costs. Appendices provide data on the number of historic properties, the estimated restoration costs at each HBCU, locations of the 103 HBCUs as of June 1, 1997, the survey, and comments from the Department of the Interior. (DB)

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United States General Accounting Office

GAO

Report to Congressional Requesters

ED 419 445

February 1998

HISTORIC PRESERVATION

Cost to Restore Historic Properties at Historically Black Colleges and Universities

HE031 216

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United States
General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-278777

February 6, 1998

The Honorable Maxine Waters
Chair, Congressional Black Caucus
House of Representatives

The Honorable James Clyburn
House of Representatives

In 1988, the Department of the Interior's National Park Service (NPS) cosponsored a survey and assessment of historic properties on the campuses of historically black colleges and universities (HBCU). The intent of the survey was to identify, assess, and prioritize historic properties and to initiate a coordinated effort to support the restoration of the properties that were deemed the highest priority. However, only about half of the schools responded to the survey. The respondents identified 144 properties in need of restoration but were not asked to identify the cost of making the restorations.

Because the response to this NPS initiative was low and the total funding requirements to restore the historic properties were not identified, you were concerned about whether sufficient information was available to prioritize the funding of restoration for historic properties at HBCUs. As a result, you asked us to provide information on (1) the number of historic properties located at the HBCUs and (2) the estimated cost to restore and preserve these properties. We also collected data on the methods used to estimate the costs and the credentials of those who prepared the cost estimates. To obtain this information, we sent a survey to all 103 HBCUs. Some of the historic property data and all of the estimated cost data presented in this report are based on self-reported data by the HBCUs. As discussed later in this report, self-reported data are subject to certain limitations. We did, however, do some limited verification to establish the validity of the data.

Results in Brief

All 103 historically black colleges and universities responded to our survey. Respondents identified 712 historic properties that were owned by the schools. Most of these properties were at a small number of these schools and were mostly buildings rather than structures, sites, or objects. About half, 323, of the historic properties identified were already on the National Register of Historic Places—the official list of sites, buildings, structures, and objects significant in American history, architecture,

archeology, engineering, and culture. The others were either eligible for the National Register on the basis of state historic preservation officers' surveys or considered historic by the colleges and universities.

According to information the schools provided, an estimated $755 million is needed to restore and preserve the 712 properties. The cost estimates include the capital improvement costs to restore and preserve the historic properties, such as making the properties more accessible to people with disabilities, replacing roofs, and removing lead-based paint or asbestos. The respondents were asked not to include routine maintenance costs. Some of the schools identified a total of about $60 million in funds that had already been set aside to restore and preserve specific historic properties. The schools used a number of different methods to calculate the estimated restoration and preservation costs. A detailed table showing the number of historic properties at each school as well as the estimated cost to restore them appears in appendix I.

Background

The Higher Education Act of 1965, as amended, defined an HBCU as a school that, among other things, was established before 1964 and is accredited or pre-accredited by a nationally recognized accrediting agency or association. The official list of schools that qualify as HBCUs is published in 34 C.F.R. 608.2(b). A map depicting the locations of the 103 HBCUs and a list of schools by state is in appendix II.

HBCUs may have historic properties and may have them listed on the National Register of Historic Places. The National Historic Preservation Act of 1966 authorized the National Register of Historic Places, the official list of the nation's districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering, and culture.[1] The National Register, administered by NPS, is part of a program to identify, evaluate, and protect the nation's cultural resources.

[1]Even though NPS includes a district as a category for listing on the National Register, our study was designed to identify individual properties. Therefore, for properties that were included in a district designation, we had the schools identify the specific buildings, structures, sites, and objects that contribute to the historical significance of the district.

Properties may be nominated for inclusion on the National Register by states[2] and federal[3] agencies. State nominations, which may be prepared by local citizens, are submitted to a state review board, which makes an approval/disapproval recommendation to the state historic preservation officer (SHPO). If the SHPO approves the nomination, it is forwarded to NPS to be considered for listing. If the nomination is approved by NPS, the property is officially entered on the National Register.

In addition to their role in the nomination process, the SHPOs are responsible for surveying and evaluating properties within their states that they believe are eligible for the National Register. The National Register's criteria for evaluating properties include a determination that the property is significant in American history, architecture, archeology, engineering, and culture and that it possesses integrity of location, design, setting, materials, workmanship, feeling, and association. In addition, at least one of the following must be present for the property to be considered historic: (1) have an association with historic events or activities; (2) have an association with the lives of people significant in the nation's past; (3) have distinct characteristics of a type, period, or method of construction; be the work of a master; have high artistic values; or be a significant, distinguishable entity; or (4) have yielded, or may likely yield, information important about prehistory or history. In addition, the property generally has to be 50 years of age or more.

The National Historic Preservation Act also established a program to provide matching grants to the states and other entities for the preservation and protection of properties on the National Register. Since the act went into effect in 1966, NPS has provided $4.3 million in grants appropriated by the Congress to HBCUs for restoring historic properties. In addition, the Congress authorized $29 million under the Omnibus Parks and Public Lands Management Act of 1996 to fund the restoration of historic properties at selected HBCUs. As of December 1, 1997, $4 million has been appropriated for this purpose. Historic properties that are either on the National Register or have been determined eligible for listing on the National Register as a result of SHPO surveys are eligible for federal grant assistance under the National Historic Preservation Act or the Omnibus Parks and Public Lands Management Act of 1996.

[2]NPS may accept a nomination directly from a citizen if the property is located in a state where there is no NPS-approved state historic preservation program. However, according to the Department of the Interior, there currently are NPS-approved state historic preservation programs in all states.

[3]Nominations to the National Register for federal properties are submitted to NPS through federal preservation officers appointed by the agency heads.

Over 700 Historic Properties Are Located at HBCUs

Most of the 712 historic properties are at a small number of HBCUs and are mostly buildings rather than structures, sites, or objects. About half of the historic properties identified are already on the National Register of Historic Places. The other half are either eligible for the National Register on the basis of SHPO surveys or considered historic by the HBCUs.

Most of the Historic Properties Are at a Small Number of HBCUs

About 66 percent of the 712 properties identified in our survey were located at 28 schools, each having 10 or more properties. Seventeen schools had no historic properties. These were mostly schools that were created or relocated to other campuses less than 50 years ago and thus were schools that did not have properties eligible to be considered as historic. Table 1 groups the schools according to how many historic properties they reported and shows the number and percentage of the total properties each group had.

Table 1: Schools Grouped by Number of Historic Properties Reported and the Number and Percentage of Properties Each Group Had

Number of properties per school	Number of schools	Percentage of schools	Number of properties	Percentage of total properties[a]
15 or more	12	11.7	288	40.4
10 to 14	16	15.5	181	25.4
5 to 9	25	24.3	166	23.3
1 to 4	33	32.0	77	10.8
0	17	16.5	0	0.0
Total	**103**	**100.0**	**712**	**100.0**

[a]The numbers in this column do not add to the total because of rounding.

Buildings Are the Most Common Type of Property

Historic properties are classified as buildings, structures, sites, or objects. A building may be, for example, a dormitory, gymnasium, house, chapel, or other construction created principally to shelter any form of human activity. A structure is distinguished from a building in that it is used for purposes other than human shelter, for example, a tower, smokestack, or gazebo. A site refers to a location of a significant event or historic occupation or activity where the location itself possesses the historic, cultural, or archeological value. Examples of sites include courtyards, gardens, and cemeteries. Objects are primarily artistic in nature or are relatively small in scale and simply constructed, such as a sculpture, bell, monument, or statue. The photos in figure 1 show examples of these types of properties.

Figure 1: Examples of Types of Historic Properties

Vawter Hall (building), Virginia State University, Virginia

Center Court (site), South Carolina State University, South Carolina

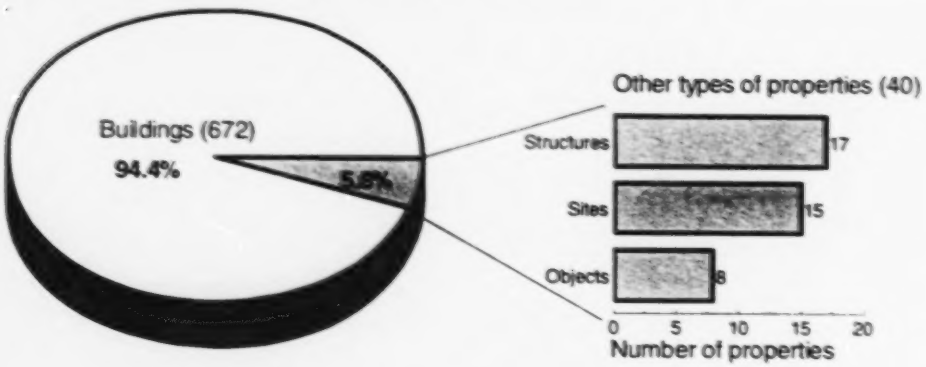
Bell (object), Bennett College, North Carolina

Smokestack (structure), South Carolina State University, South Carolina

Sources: Photos provided by the schools

On the basis of our survey, 94.4 percent of the historic properties at the HBCUs were buildings. The remaining 5.6 percent were structures, sites, or objects. Figure 2 shows the type of properties and percentage of each type.

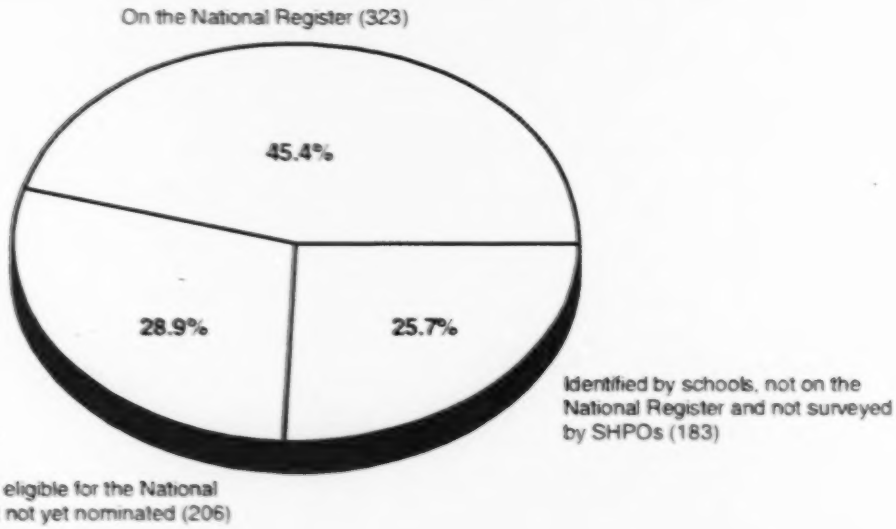
Figure 2: Percentage and Number of Properties by Type



About Half of the Historic Properties Are on the National Register

Of the 712 properties respondents identified, 323, or 45.4 percent, were listed on the National Register. These properties have been evaluated and approved for listing by NPS in accordance with the established National Register criteria. Of the remaining properties, 206, or 28.9 percent, were identified through surveys and evaluations completed by the SHPOs but had not yet been nominated to the National Register. The remaining 183 properties, or 25.7 percent, were identified by the schools as historic but were not on the National Register and had not been surveyed or assessed by the SHPOs. In the schools' opinion, these properties would be eligible for the National Register if they were surveyed and assessed by a SHPO and nominated to the National Register. Figure 3 shows the percentage and number of properties listed on the National Register, surveyed and assessed by the SHPOs, or identified by the schools as historic but not included in either of the other two categories.

Figure 3: Percentage and Number of Properties by Category


On the National Register (323)
45.4%
28.9%
25.7%
Identified by schools, not on the National Register and not surveyed by SHPOs (183)
Identified as eligible for the National Register but not yet nominated (206)

HBCUs Estimate That About Three-Quarters of a Billion Dollars Is Needed to Restore Historic Properties

The schools estimated that the restoration of the 712 historic properties would cost about $755 million. Most of the estimated restoration cost comes from fewer than half of the schools, and about half of the cost is for properties listed on the National Register. Schools have funds set aside to cover less than a tenth of the estimated restoration costs.

Most of the Cost to Restore Properties at HBCUs Is Concentrated at Less Than Half of the Schools

In their estimates of the cost to restore the 712 historic properties—which totaled $755 million—the schools provided a wide range of figures for individual properties. The wide range can be attributed to (1) whether a property was recently restored and the condition of those not restored and (2) the size of the area needing restoration. Over 90 percent of the total cost ($681.2 million) was associated with 44 of the schools. The cost to restore all the properties at each of these schools ranged from $5 million to over $20 million. Table 2 shows the number and percentage of schools that fall within various cost ranges and the total costs and percentage of total costs within those ranges.

Table 2: Number and Percentage of Schools in Different Cost Ranges and Total Costs and Percentage of Total Costs Within Those Ranges

Range of restoration costs per school	Number of schools	Percentage of schools[a]	Total cost to restore these properties[a] (in millions)	Percentage of total cost to restore these properties
$20 million and over	12	11.7	$317.9	42.1
$5 million to $19,999,999	32	31.1	363.3	48.1
$1 million to $4,999,999	27	26.2	68.1	9.0
$1 to $999,999	14	13.6	5.8	0.8
$0	18	17.5	0.0	0.0
Total	**103**	**100.0**	**$755.0**	**100.0**

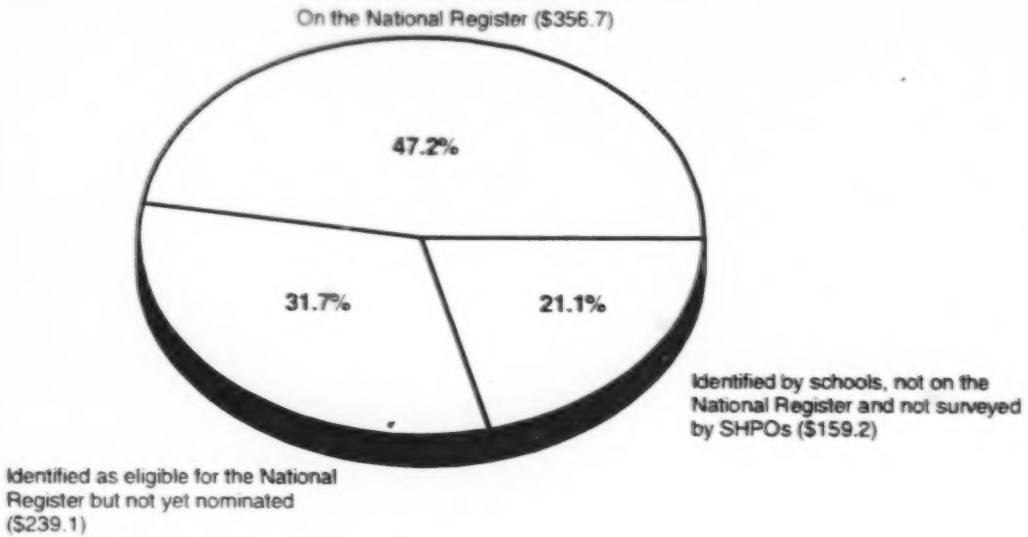
[a]The numbers in this column do not add to the total because of rounding.

As shown in table 2, 18 of the 103 schools did not have any restoration costs associated with the historic properties. Of these, 17 had no properties, and therefore, no cost. One school had two properties and, as both of them had been recently renovated, no additional funds for restoration were needed, according to the school. Some of the 85 schools with properties having restoration costs also had one or more properties that the schools estimated had no restoration costs. The reasons given by these schools for not identifying any costs included that (1) the property had been recently restored and no additional funds were needed and (2) the property did not need any restoration. For the most part, properties that did not need any restoration were buildings.

Most Restoration Costs Are for Properties Either Listed on or Eligible for the National Register of Historic Places

Of the estimated $755 million needed to restore the 712 properties, $356.7 million was for properties listed on the National Register; $239.1 million was for properties eligible for the National Register on the basis of SHPO surveys and assessments; and $159.2 million was for properties identified by the schools as historic but not included in either of the previous two categories. It should be noted that properties that are not listed on the National Register and that have not been surveyed by the SHPO and assessed to be eligible for listing on the National Register currently are not eligible for federal grant assistance under existing legislation. Therefore, $595.8 million of the $755 million is currently eligible for federal grant assistance. Figure 4 shows the restoration costs of properties by category.

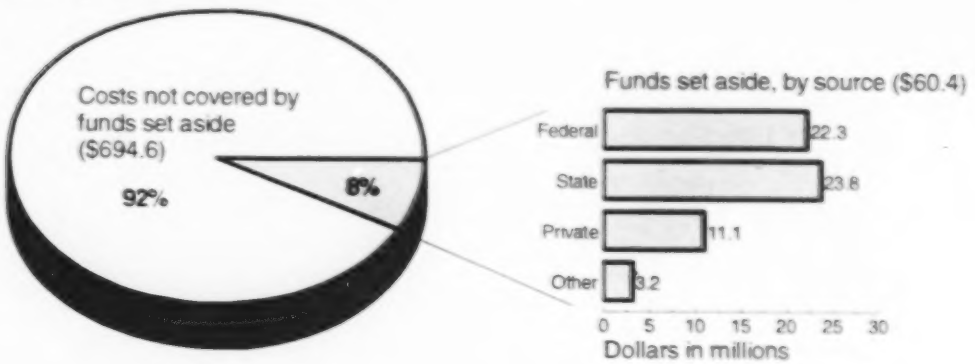
Figure 4: Percentage and Amount of Restoration Costs of Properties by Category (Dollars in millions)


On the National Register ($356.7)
47.2%
31.7%
21.1%
Identified by schools, not on the National Register and not surveyed by SHPOs ($159.2)
Identified as eligible for the National Register but not yet nominated ($239.1)

Some Funds Have Been Set Aside for Restoration

Of the estimated $755 million needed to restore the properties, 36 schools reported that $60.4 million, about 8 percent, had already been set aside to pay the restoration costs for specific properties. As shown in figure 5, of the total set aside, $22.3 million, or 36.9 percent, was from federal sources; $23.8 million, or 39.3 percent, was from state funding sources; and $11.1 million, or 18.4 percent, was from private funding sources. The remaining $3.2 million, or 5.3 percent, was from sources such as a university fund.

Figure 5: Funds Set Aside for Restoration as a Percentage of the Total Estimated Restoration Costs, by Funding Source
(Dollars in millions)



The $60.4 million set aside was for the restoration of 58 properties at 36 schools. For 32 of these properties, the amount of the set-aside was the full amount needed to cover the total estimated restoration costs. For the remaining 26 properties, the set-aside covered a portion of the total restoration costs.

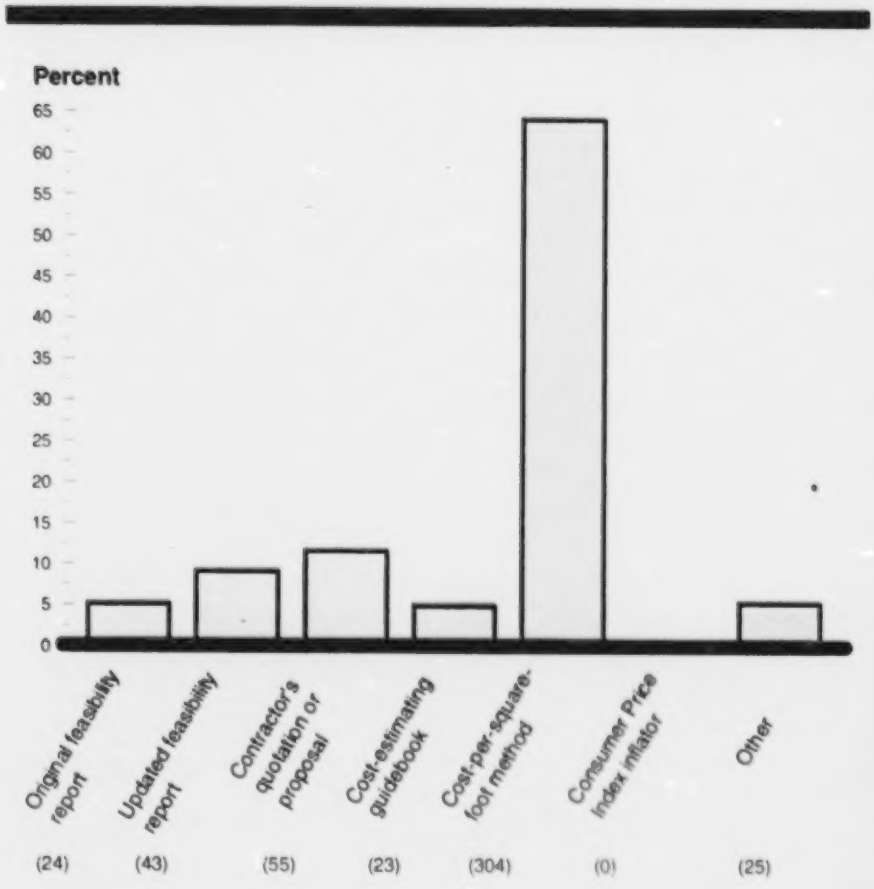
Cost-Per-Square-Foot Was the Most Common Method Used to Calculate Restoration Costs

The schools used different, but common, methods to calculate restoration costs. These methods were an original feasibility report, an updated feasibility report, a contractor's quotation or proposal, a cost-estimating guidebook, a cost-per-square-foot calculation, and a Consumer Price Index inflator. If the schools used other methods, we asked them to explain what they were. An original or updated feasibility report is typically prepared by an architectural or engineering firm and generally describes what is feasible to restore and how much the work would cost. A contractor's quotation or proposal is an estimate prepared by a contractor to restore a property for the stated price or bid. A cost-estimating guidebook is a reference guide prepared by the architectural engineering industry that gives probable restoration costs by the type of work to be done, such as roof repair, and the materials used. The cost-per-square-foot method uses the industry's average restoration cost for a locality multiplied by the number of square feet that need to be restored. A Consumer Price Index inflator is a percentage increase each year based on the inflation rate; this method is used to adjust estimates that have already been prepared.

Generally, the most comprehensive methods of estimating restoration costs would be an original or updated feasibility report, followed by a contractor's quotation or proposal. The cost-estimating guidebook, cost-per-square-foot, and Consumer Price Index inflator methods are generally less accurate because they represent guidance, or averages, rather than estimates on specific properties. Even though an original or updated feasibility report is most likely to be more accurate, some of the schools we visited stated that the cost of paying architect or engineering firms or contractors to provide such estimates was prohibitive and that the estimates could not be completed in the time necessary to respond to our survey. As a result, some schools used other methods, such as the cost-per-square-foot method, to avoid incurring excessive costs and still meet our survey deadline. It should be pointed out that estimating the amount of restoration and preservation needed can be a very complex undertaking. As a result, estimates, even those done by professionals under the best of circumstances, cannot be exact. Many restoration problems, particularly those involving major repairs or renovations, are not visible to the naked eye and may not be uncovered until the restoration actually takes place. In addition, cost estimates to restore and preserve properties are just that, estimates, and are subject to revisions until the work is completed.

We asked the schools to identify whether one or a combination of methods was used in calculating their estimates. Of the 673 properties that had restoration costs (39 properties had none), 474 had estimates made using a single method, such as the cost-per-square-foot method. For 199 properties, a combination of methods was used. As shown in figure 6, the cost-per-square-foot method was the predominant single method used.

Figure 6: Percentage of Times That a Single Method Was Used to Estimate Restoration Costs, by Method



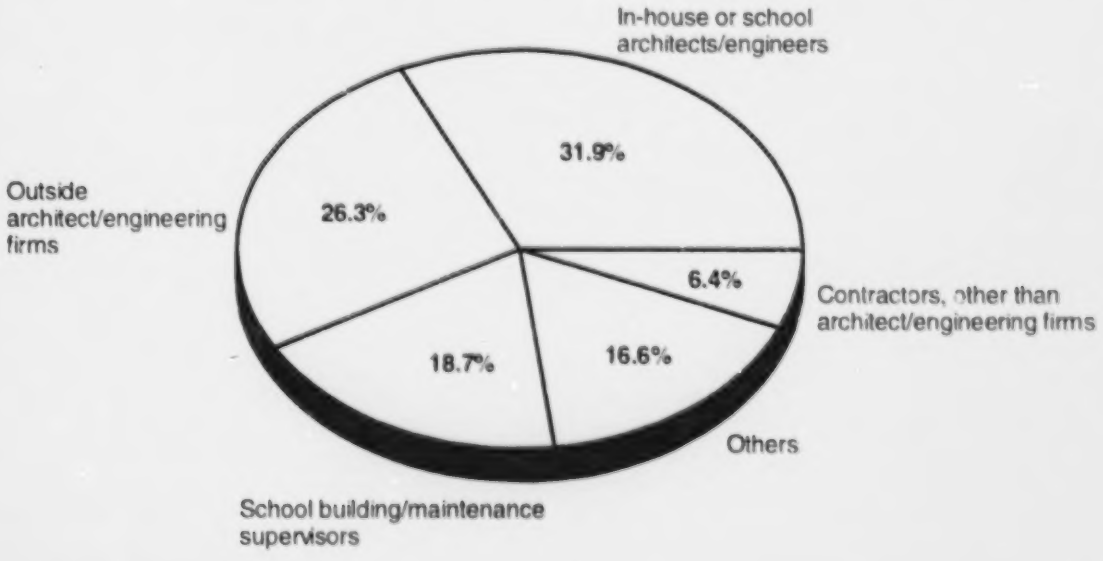
When more than one method was used, many different combinations occurred. These included, for example, using (1) an original feasibility study estimate with a Consumer Price Index inflator; (2) a cost-estimating guidebook with a Consumer Price Index inflator; and (3) a contractor's quotation with a cost-estimating guidebook and cost-per-square-foot calculations.

School Officials Prepared Most of the Restoration Cost Estimates

We asked the schools to identify whether the preparers of their cost estimates were (1) outside architect/engineering firms, (2) in-house architects/engineers, (3) contractors, (4) school building/maintenance supervisors, or (5) other types of individuals or firms. Typically outside architect/engineering firms prepare original and updated feasibility reports, contractors prepare quotations or proposals, and in-house architects/engineers or building/maintenance supervisors prepare estimates using the guidebooks and cost-per-square-foot method. All of these types of preparers can and will use the Consumer Price Index inflator to adjust previous cost estimates.

As shown in figure 7, the estimates of the restoration costs were primarily prepared by in-house architects/engineers, followed by outside architect/engineering firms and in-house building/maintenance supervisors.

Figure 7: Percentage of Estimates Done by the Different Types of Preparers



Observations

The information in this report represents the most comprehensive data collected to date on the number of historic properties at HBCUs and the estimated costs to restore those properties. However, the cost estimates

presented in this report are based on self-reported data and are subject to limitations. Furthermore, as previously pointed out, estimating the amount of restoration and preservation needed can be a very complex undertaking. As a result, estimates, even those done by professionals under the best of circumstances, cannot be exact. However, these data are a useful starting point for determining the total restoration requirements at HBCUs.

Agency Comments

We provided copies of a draft of this report to the Department of the Interior for its review and comment. The Department commented that highly significant properties on the campuses of historically black colleges and universities are important national historic treasures worthy of care and attention. The Department, however, noted that the magnitude of the repair cost estimates reported by the schools is substantial in terms of the limited level of appropriations available from the Historic Preservation Fund for matching grants to state historic preservation officers and Indian tribes, and the grants available to historically black colleges and universities pursuant to section 507 of the Omnibus Parks and Public Lands Management Act of 1996. The Department also pointed out that funding for increased appropriations for grants to historically black colleges and universities would be subject to authorization and the budgetary controls imposed under the Omnibus Budget Enforcement Act of 1990, as amended. We agree with the Department that there are budgetary limitations that must be addressed when considering the restoration of historic properties at the schools.

The Department concurred with our discussion of the methodologies used by the schools in estimating the cost to restore historic properties. It noted that the restoration cost estimates may include some work that would not conform to the Secretary's Standards for the Treatment of Historic Properties—such as sandblasting brick, which would cause the degeneration of the historic materials and appearance. Thus, not all work included in the estimates may be eligible for federal assistance. The Department agreed that the cost of preservation work on historic properties can escalate beyond initial estimates because the need for some major repairs may not be uncovered until the restoration actually begins. Interior's comments and our responses are in appendix IV.

Scope and Methodology

Our study included all HBCUs defined under the Higher Education Act of 1965, as amended, and listed in 34 C.F.R. 608.2(b). As of June 1, 1997, there

were 103 such schools. To gather background data and to develop and pretest a standardized data collection instrument (survey) for our study, we visited 12 HBCUs in North Carolina, South Carolina, and Virginia.

To determine the number of historic properties on the campuses of the 103 HBCUs, we used three sources. First, we obtained a list of historic properties on the National Register of Historic Places from NPS, including properties (buildings, structures, sites, and objects) within historic districts on the National Register and properties that contribute to the historic significance of the districts.[4]

Second, in conjunction with NPS, we contacted each of the 22 SHPOs in whose jurisdictions the 103 HBCUs were located. NPS sent a letter to each of the 22 SHPOs explaining the nature of our study and provided them with lists of the HBCUs in their states as well as the historic properties in the National Register database. NPS also provided us with each SHPO contact. We asked each of the SHPOs to verify the National Register list as of June 1, 1997, or to submit corrected information. NPS used the SHPOs' information to update the National Register as warranted. We also asked each SHPO to provide a list of properties at each HBCU that would be eligible for the National Register as a result of the surveys and evaluations that the SHPO conducted at the HBCUs prior to June 1, 1997, but that had not been nominated.

Third, we sent each of the 103 HBCUs a survey that included (1) a list of its properties that the SHPO had verified were on the National Register and (2) a list of its properties that the SHPO had told us were eligible for the National Register on the basis of its surveys and evaluations. We asked each HBCU to verify the existence of these properties, to delete properties that no longer existed or that the school never or no longer owned, and to add properties that the school believed met the criteria to be eligible for the National Register. Because the data from the SHPOs were as of June 1, 1997, we asked the schools to provide their data as of June 1, 1997. A copy of the survey sent to each of the 103 HBCUs is in appendix III.

To determine the estimated restoration costs for the historic properties, we asked each HBCU to provide a cost estimate to restore each property identified. We requested that the estimate include only capital improvement costs and not normal day-to-day operating and maintenance costs. We also requested that the capital improvement costs include only

[4]Beth L. Savage and Nathan Poe, "Historic Properties Listed in the National Register of Historic Places at Historically Black Colleges and Universities" (Washington, D.C.: National Park Service, May 30, 1997).

costs after June 1, 1997. In other words, if an HBCU was restoring a property, expenditures prior to June 1, 1997, were not to be included in the estimate. Each HBCU decided on the extent of restoration needed in making its estimates.

We did not independently verify the accuracy of the cost estimates the HBCUs submitted. We did, however, ask the schools to provide information on the methods they used to estimate the costs, such as whether the estimates were based on feasibility studies, contractors' bids, or cost-per-square-foot calculations. We also asked the schools to provide the names and credentials of the preparers of the cost estimates, such as whether the preparers were professional architect/engineering firms, contractors, or school building/maintenance supervisors. We conducted our study from April 1997 through January 1998 in accordance with generally accepted government auditing standards.

Some of the historic property data and all of the estimated cost data for the restoration and preservation of the historic properties presented in this report are based on self-reported data from the HBCUs. The accuracy of the results contained in this report is affected by the extent to which the respondents accurately reported the number of historic properties at their schools and the estimated costs to restore and preserve these properties. Also, according to NPS officials, the estimates may include costs for work that does not meet the Secretary of the Interior's Standards for the Treatment of Historic Properties, particularly if the individuals preparing the estimates are not familiar with those standards.

As agreed with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to the Secretary of the Interior; the Secretary of Education; the Director, National Park Service; and the Director, Office of Management and Budget. We will also make copies available to others upon request.

Please call me at (202) 512-3841 if you or your staff have any questions. Major contributors to this report are listed in appendix V.

Victor S. Rezendes
Director, Energy, Resources,
and Science Issues

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Abbreviations

HBCU	historically black college or university
NPS	National Park Service
SHPO	state historic preservation officer

Number of Historic Properties and Estimated Total Restoration Cost at Each Historically Black College and University, as of June 1, 1997

School	On National Register		Eligible for National Register		Others as identified by schools		Total	
	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost
Alabama A&M University	1	$0	0	•	7	$2,719,000	8	$2,719,000
Alabama State University	0	•	16	$19,679,000	2	390,000	18	20,069,000
Albany State University	0	•	3	2,235,000	0	•	3	2,235,000
Alcorn State University	8	7,479,000	0	•	1	1,519,000	9	8,998,000
Allen University	4	8,724,000	1	75,000	1	2,122,000	6	10,921,000
Arkansas Baptist College	1	150,000	0	•	1	60,000	2	210,000
Barber-Scotia College	3	3,350,000	1	84,000	0	•	4	3,434,000
Benedict College	5	3,442,000	1	1,121,000	0	•	6	4,563,000
Bennett College	19	5,402,000	6	5,710,000	5	3,188,000	30	14,300,000
Bethune-Cookman College	7	4,177,000	0	•	3	3,705,000	10	7,882,000
Bishop State Community College	0	•	0	•	1	70,000	1	70,000
Bluefield State College	0	•	0	•	1	239,000	1	239,000
Bowie State University	1	390,000	0	•	0	•	1	390,000
C A. Fredd State Technical College	0	•	0	•	2	1,100,000	2	1,100,000
Central State University	0	•	0	•	0	•	0	•
Cheyney University of Pennsylvania	1	310,000	9	23,055,000	0	•	10	23,365,000
Claflin College	4	1,523,000	0	•	1	32,000	5	1,555,000
Clark Atlanta University	4	1,554,000	0	•	12	5,484,000	16	7,038,000
Coahoma Community College	0	•	1	100,000	3	145,000	4	245,000
Concordia College	0	•	2	559,000	0	•	2	559,000
Coppin State College	0	•	0	•	0	•	0	•
Delaware State University	1	1,500,000	6	1,420,000	0	•	7	2,920,000
Denmark Technical College	0	•	0	•	4	1,918,000	4	1,918,000
Dillard University	0	•	0	•	7	8,650,000	7	8,650,000
Edward Waters College	1	2,369,000	0	•	6	7,403,000	7	9,772,000
Elizabeth City State University	13	22,788,000	0	•	0	•	13	22,788,000
Fayetteville State University	0	•	10	1,346,000	0	•	10	1,346,000
Fisk University	21	10,942,000	0	•	0	•	21	10,942,000
Florida A&M University	17	46,218,000	3	1,383,000	0	•	20	47,601,000
Florida Memorial College	0	•	0	•	0	•	0	•
Fort Valley State University	0	•	9	13,494,000	0	•	9	13,494,000
Grambling State University	0	•	0	•	5	5,773,000	5	5,773,000

(continued)

Appendix I
Number of Historic Properties and Estimated Total Restoration Cost at Each Historically Black College and University, as of June 1, 1997

School	On National Register		Eligible for National Register		Others as identified by schools		Total	
	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost
Hampton University	7	7,450,000	0	•	6	10,650,000	13	18,100,000
Harris-Stowe State College	0	•	0	•	0	•	0	•
Hinds Community College - Utica Campus	0	•	1	539,000	0	•	1	539,000
Howard University	2	22,184,000	0	•	0	•	2	22,184,000
Huston-Tillotson College	2	3,000,000	0	•	0	•	2	3,000,000
Interdenominational Theological Center	0	•	0	•	0	•	0	•
J.F. Drake State Technical College	0	•	0	•	0	•	0	•
Jackson State University	1	1,240,000	0	•	0	•	1	1,240,000
Jarvis Christian College	0	•	3	700,000	1	150,000	4	850,000
Johnson C. Smith University	1	5,316,000	10	9,239,000	0	•	11	14,555,000
Kentucky State University	2	1,134,000	0	•	0	•	2	1,134,000
Knoxville College	15	10,357,000	0	•	0	•	15	10,357,000
Lane College	6	2,271,000	0	•	0	•	6	2,271,000
Langston University	0	•	6	3,025,000	0	•	6	3,025,000
Lawson State Community College	0	•	0	•	4	2,955,000	4	2,955,000
LeMoyne-Owen College	1	1,500,000	0	•	2	2,534,000	3	4,043,000
Lewis College of Business	0	•	0	•	0	•	0	•
Lincoln University, Missouri	7	5,286,000	5	3,171,000	1	266,000	13	8,723,000
Lincoln University, Pennsylvania	0	•	1	340,000	25	15,215,000	26	15,555,000
Livingstone College	13	15,353,242	2	1,100,000	12	9,910,700	27	26,363,942
Mary Holmes College	5	2,050,000	0	•	0	•	5	2,050,000
Meharry Medical College	0	•	2	22,474,000	0	•	2	22,474,000
Miles College	6	1,489,000	0	•	12	12,060,000	18	13,549,000
Mississippi Valley State University	0	•	0	•	0	•	0	•
Morehouse College	4	170,000	0	•	1	2,625,000	5	2,795,000
Morehouse School of Medicine	0	•	0	•	0	•	0	•
Morgan State University	0	•	1	1,315,000	7	11,580,000	8	12,895,000
Morris Brown College	5	11,401,000	0	•	0	•	5	11,401,000
Morris College	0	•	0	•	0	•	0	•
Norfolk State University	0	•	0	•	2	687,000	2	687,000

(continued)

Appendix I
Number of Historic Properties and Estimated Total Restoration Cost at Each Historically Black College and University, as of June 1, 1997

School	On National Register		Eligible for National Register		Others as identified by schools		Total	
	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost
North Carolina A&T State University	6	3,467,000	0	•	6	6,547,000	12	10,014,000
North Carolina Central University	8	15,009,000	3	4,211,000	0	•	11	19,220,000
Oakwood College	0	•	0	•	5	505,000	5	505,000
Paine College	0	•	0	•	3	3,747,000	3	3,747,000
Paul Quinn College	0	•	0	•	0	•	0	•
Philander Smith College	1	30,000	0	•	0	•	1	30,000
Prairie View A&M University	0	•	7	11,037,000	0	•	7	11,037,000
Rust College	1	198,000	1	802,000	0	•	2	1,000,000
Saint Augustine's College	11	12,627,000	0	•	0	•	11	12,627,000
Saint Paul's College	3	1,195,000	0	•	0	•	3	1,195,000
Saint Philip's College	0	•	2	500,000	0	•	2	500,000
Savannah State University, State College Branch	1	1,820,000	9	7,950,000	0	•	10	9,770,000
Selma University	0	•	6	2,189,000	0	•	6	2,189,000
Shaw University	6	6,058,000	0	•	1	324,000	7	6,382,000
Shorter College	0	•	0	•	0	•	0	•
South Carolina State University	3	8,050,000	11	10,870,000	0	•	14	18,920,000
Southern University and A&M College	1	440,000	0	•	0	•	1	440,000
Southern University, New Orleans	0	•	0	•	0	•	0	•
Southern University, Shreveport	0	•	0	•	0	•	0	•
Southwestern Christian College	0	•	2	501,000	0	•	2	501,000
Spelman College	12	25,495,000	0	•	0	•	12	25,495,000
Stillman College	0	•	4	850,000	7	4,639,000	11	5,489,000
Talladega College	32	13,239,000	1	15,000	0	•	33	13,254,000
Tennessee State University	7	20,202,000	0	•	1	850,000	8	21,052,000
Texas College	0	•	0	•	0	•	0	•
Texas Southern University	0	•	1	4,037,000	0	•	1	4,037,000
Tougaloo College	1	932,000	9	10,240,000	0	•	10	11,172,000
Trenholm State Technical College	0	•	0	•	0	•	0	•
Tuskegee University	16	13,504,000	0	•	12	11,577,000	28	25,081,000

(continued)

Appendix I
Number of Historic Properties and Estimated Total Restoration Cost at Each Historically Black College and University, as of June 1, 1997

	On National Register		Eligible for National Register		Others as identified by schools		Total	
School	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost	Number	Restoration cost
University of Arkansas at Pine Bluff	1	2,500,000	1	100,000	1	40,000	3	2,640,000
University of Maryland Eastern Shore	0	•	2	800,000	5	2,360,000	7	3,160,000
University of the District of Columbia	2	4,260,000	1	8,623,000	2	9,855,000	5	22,738,000
University of the Virgin Islands	0	•	3	18,404,200	0	•	3	18,404,200
Virginia State University	2	2,216,000	34	36,436,800	0	•	36	38,652,800
Virginia Union University	8	5,300,000	0	•	0	•	8	5,300,000
Voorhees College	10	9,500,000	0	•	0	•	10	9,500,000
West Virginia State College	2	0	0	•	0	•	2	0
Wilberforce University	0	•	0	•	0	•	0	•
Wiley College	0	•	2	240,000	2	862,000	4	1,102,000
Winston-Salem State University	1	135,000	8	9,157,000	0	•	9	9,292,000
Xavier University	0	•	0	•	3	4,715,000	3	4,715,000
Total	**323**	**$356,696,242**	**206**	**$239,127,000**	**183**	**$159,179,700**	**712**	**$755,002,942**
Percentage of total	**45.4**	**47.2**	**28.9**	**31.7**	**25.7**	**21.1**	**100**	**100%**

Notes: Properties shown in appendix I are those that were owned and still existed as of June 1, 1997. Not shown are properties that are scheduled for destruction, properties that were never or no longer owned, and properties that no longer exist.

A cost of $0 means that the property was restored prior to June 1, 1997. A "•" in the cost column means that, because there were zero properties owned, there was no associated cost of restoration.

Locations of the 103 Historically Black Colleges and Universities, as of June 1, 1997

Alabama
Alabama A&M University
Alabama State University
Bishop State Community College
C.A. Fredd State Technical College
Concordia College
J.F. Drake State Technical College
Lawson State Community College
Miles College
Oakwood College
Selma University
Stillman College
Talladega College
Trenholm State Technical College
Tuskegee University

Arkansas
Arkansas Baptist College
Philander Smith College
Shorter College
University of Arkansas at Pine Bluff

Delaware
Delaware State University

District of Columbia
Howard University
University of the District of Columbia

Florida
Bethune-Cookman College
Edward Waters College
Florida A&M University
Florida Memorial College

Georgia
Albany State University
Clark Atlanta University

Georgia Cont.
Fort Valley State University
Interdenominational Theological Center
Morehouse College
Morehouse School of Medicine
Morris Brown College
Paine College
Savannah State University, State College Branch
Spelman College

Kentucky
Kentucky State University

Louisiana
Dillard University
Grambling State University
Southern University and A&M College
Southern University, New Orleans
Southern University, Shreveport
Xavier University

Maryland
Bowie State University
Coppin State College
Morgan State University
University of Maryland Eastern Shore

Michigan
Lewis College of Business

Mississippi
Alcorn State University
Coahoma Community College
Hinds Community College - Utica Campus
Jackson State University
Mary Holmes College
Mississippi Valley State University
Rust College

Mississippi Cont.
Tougaloo College

Missouri
Harris-Stowe State College
Lincoln University

North Carolina
Barber-Scotia College
Bennett College
Elizabeth City State University
Fayetteville State University
Johnson C. Smith University
Livingstone College
North Carolina A&T State University
North Carolina Central University
Saint Augustine's College
Shaw University
Winston-Salem State University

Ohio
Central State University
Wilberforce University

Oklahoma
Langston University

Pennsylvania
Cheyney University of Pennsylvania
Lincoln University

South Carolina
Allen University
Benedict College
Claflin College
Denmark Technical College
Morris College
South Carolina State University
Voorhees College

Tennessee
Fisk University
Knoxville College
Lane College
LeMoyne-Owen College
Meharry Medical College
Tennessee State University

Texas
Huston-Tillotson College
Jarvis Christian College
Paul Quinn College
Prairie View A&M University
Saint Philip's College
Southwestern Christian College
Texas College
Texas Southern University
Wiley College

Virginia
Hampton University
Norfolk State University
Saint Paul's College
Virginia Sate University
Virginia Union University

Virgin Islands
University of the Virgin Islands

West Virginia
Bluefield State College
West Virginia State College

Survey Sent to Each of the 103 Historically Black Colleges and Universities

Enclosure 1 Enclosure 1

U.S. General Accounting Office

GAO Survey of Historic Properties at Historically Black Colleges and Universities (HBCUs)

Introduction

The U.S. General Accounting Office (GAO), an independent agency of the U.S. Congress, is conducting a study concerning the preservation and restoration of historic properties (e.g., buildings, structures, sites and objects) on the campuses of historically black colleges and universities (HBCUs).

As part of our study, we are sending this data collection instrument (DCI) to all HBCUs that are listed in the code of federal regulations, specifically 34 CFR Sec. 608.2 (b). The schools listed in the code must be a historically black college or university that was established before 1964, be accredited or pre-accredited by a nationally recognized accrediting agency or association and that the Secretary of Education has determined to be a reliable authority as to the quality of education or training offered.

The purpose of this DCI is to obtain data on the number of historic properties on your campus and the estimated cost associated with preserving and restoring these properties. This study is in response to congressional concerns relating to the need for a complete and accurate inventory of historical properties located at HBCUs and the estimated cost to preserve and restore these properties. Your cooperation is vital to the completeness and accuracy of our study.

Please complete the DCI and return it to us within 30 days of receipt. We have provided a postage-paid business reply envelope to facilitate the return of your DCI. However, in the event that this return envelope is misplaced, please send the completed DCI to:

U.S. General Accounting Office
RCED/Energy, Resources & Science Division
Attn: Mr. Chet Janik
441 G Street, N.W., Rm. 2T23
Washington, D.C. 20548

If you have any questions, please contact Mr. Chet Janik at 202-512-6508.

Definitions

The National Register of Historic Places is the official list of the Nation's cultural resources worthy of preservation. Properties that are listed in the National Register can be buildings, structures, sites or objects that are significant in American history. According to the U.S. Department of Interior, National Park Service (DOI/NPS), a historic property must meet certain criteria to qualify for listing on the National Register of Historic Places. These criteria include:

- o Association with historic events or activities
- o Association with important persons
- o Distinctive design or physical characteristics
- o Potential to provide important information about prehistory or history
- o Generally, the property must be 50 years of age or more

DOI/NPS defines a building, structure, site and object in the following way:

Building (b): A building, such as a house, barn, church, hotel or similar construction which is created principally to shelter any form of human activity. May also be used to refer to a historically and functionally related unit, such as a courthouse and jail.

Site (si): A site is a location of a significant event, a prehistoric or a historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure (e.g., ceremonial sites, gardens, cemeteries, etc.).

Structure (st): Distinguished from buildings in that they are functional constructions made usually for purposes other than creating human shelter (e.g., bridges, towers, gazebos, etc.).

Object (o): Distinguished from buildings and structures in that they are primarily artistic in nature or are relatively small in scale and simply constructed (e.g., sculpture, monument, statue, etc.).

Note: Even though the NPS includes a district as a category for listing on the National Register, our study is designed to identify specific properties. Therefore, for properties that you own which are included in a district designation, we would like you to identify the specific buildings, structures, sites, and objects that contribute to the historical significance within the district. The contributing properties do not necessarily have to be 50 years old, but rather contribute to the documented significance of the historic district (i.e., the civil rights movement of the 1960s). For those identified, please label them as a building, structure, site, or object as shown on the attached tables, if any.

Instructions For Completing Sections 1 and 2

Section 1 listing of properties (if any) on your campus that are listed on the National Register **as of June 1, 1997**.

Section 2 listing of properties (if any) on your campus that ***are not listed*** on the National Register **as of June 1, 1997**, but are properties that your State Historic Preservation Officer (SHPO) has assessed and identified as being eligible for listing. If there are differences in what is provided in sections 1 and 2 and what you believe should be in these sections, then you may want to contact your State Preservation Office. We have included an enclosure (Enclosure 3) with the name and telephone number for your State Preservation Office.

Please provide the following information for Sections 1 and 2:

a) Confirm whether or not the properties are owned by your school and that each still exists. If a property no longer exists, please explain what happened to the property. If you identify an additional property(s) that is included on the National Register, please add it to section 1 along with the Register identification number and the date it was placed on the Register. If you identify an additional property(s) that the state has assessed and identified as being eligible for the Register, but is not yet listed, please add it to section 2 along with the state identification number, if available. We have provided an additional page at the end of sections 1 and 2 if you need to include additional properties. If additional pages are necessary, you may duplicate these pages.

b) For each of those properties that you have confirmed as existing and owned by you, provide an estimated cost figure that is needed to restore and preserve the property to make it safe and/or more usable (i.e., making the property more accessible, replacing the roof, replacing/adding to the heating or air conditioning system, repointing brick mortar, removing lead-based paint and/or asbestos). Also, for the estimated cost figure provided for each property, specify the source and amount of funds, if any, that have been set aside from various sources to preserve and restore this property.

   Note: DO NOT include routine maintenance costs or funds already spent on these properties prior to June 1, 1997. In other words, the cost estimate should only include restoration and preservation costs planned after June 1, 1997. The figures you provide should be current. That is, the figures should be updated if they were calculated more than 1 year ago.

c) Identify all methods used in calculating the estimate in column b.

d) Provide the name, title and telephone number of the individual(s) or business that prepared the estimated cost figures as well as the credentials of the preparer of the cost estimate.

Section 3 provides you with an opportunity to list ***any other properties*** on your campus, **as of June 1, 1997**, that are not listed in section 1 and have not been assessed by your SHPO in section 2, but which you believe are eligible to be listed on the National Register. If properties listed in this section are located in a historical district, only include those properties that contribute to the historical significance of the district.

Please provide the following information for section 3:

a) The same information requested in b, c & d above. Since the properties you list in section 3 are properties that you have identified, confirmation that the property exists is not needed.

We have provided an additional page at the end of section 3 if you need to include additional properties. If additional pages are necessary, you may duplicate this page.

A table heading is included as Enclosure 2. You may wish to place this above each of the tables so that the instructions and codes are readily available.

Section 1. According to the National Register of Historic Places, the properties listed in the table below are on your campus and are listed on the National Register as of June 1, 1997.

	(a)	(b)	(c)	(d)
Name and Type of Property **(b)=Building** **(si)=Site** **(st)=Structure** **(o)=Object** **If the property is a building, please provide the square footage.**	Is the property owned **and/or** still existing? 1=Yes, both owned and still exists **(Enter 1 below, then complete b, c, and d of this section)** 2=Yes, both owned and exists, but will be destroyed 3= Never or no longer owned, but still exists 4= No longer exists (Please describe what happened to the property) **(If 2, 3 or 4, then enter code below and STOP Do not complete columns b, c and d for these properties)**	Estimated total cost to preserve & restore Please provide only the estimated cost to be spent after 6/1/97. Please provide only capital expenditure costs and not operating and maintenance costs Of the total cost estimated below, specify the source and amount of funds, if any, that have been set aside from each source	How was the estimate calculated? 1=Original feasibility report 2=Updated feasibility report 3=Actual contractor quotations or contractor proposals 4=Cost estimating guidebook 5=Cost per square foot 6=Consumer Price Index (CPI) inflator 7=Other (specify below)	Principal preparer of latest cost estimate. a. Name b. Title c. Telephone number d. Credentials of preparer (Enter code listed below) 1=Outside architect/engineering firm 2=In-house or school architect/engineer 3=Contractor - other than architect/ engineering firm 4=School building/maintenance supervisor 5=Other (Specify)
1 _____(Enter square feet of building)	____ (Enter code)	Total cost to preserve & restore **(in thousands)** $_____,_____,000 Funds set aside to preserve & restore from: (If none, enter 0.) Federal $____,____,000 State $____,____,000 Private $____,____,000 Other $____,____,000	**(Check all that apply)** 1. ___ 4. ___ 2. ___ 5. ___ 3. ___ 6. ___ 7. ___ _____	a. _____ b. _____ c. ( )_____ d. _____ (Enter code from above)

Section 2. The properties listed in the table below are not listed on the National Register as of June 1, 1997, but are structures that a State Historic Preservation Officer (SHPO) has assessed and identified as being eligible for listing but has not yet been listed on the Register.

	(a)	(b)	(c)	(d)
Name and Type of Property (b)=Building (si)=Site (st)=Structure (o)=Object **If the property is a building, please provide the square footage.**	Is the property owned **and/or** still existing? 1=Yes, both owned and still exists **(Enter 1 below, then complete b, c, and d of this section)** - - - - - - - - - - - - - - - - - 2=Yes, both owned and exists, but will be destroyed 3= Never or no longer owned, but still exists 4= No longer exists (Please describe what happened to the property) **(If 2, 3 or 4, then enter code below and STOP Do not complete columns b, c and d for these properties)**	Estimated total cost to preserve & restore. Please provide only the estimated cost to be spent after 6/1/97. Please provide only capital expenditure costs and not operating and maintenance costs. Of the total cost estimated below, specify the source and amount of funds, if any, that have been set aside from each source.	How was the estimate calculated? 1=Original feasibility report 2=Updated feasibility report 3=Actual contractor quotations or contractor proposals 4=Cost estimating guidebook 5=Cost per square foot 6=Consumer Price Index (CPI) inflator 7=Other (specify below)	Principal preparer of latest cost estimate a. Name b. Title c. Telephone number d. Credentials of preparer (Enter code listed below) 1=Outside architect/engineering firm 2=In-house or school architect/engineer 3=Contractor - other than architect/ engineering firm 4=School building/maintenance supervisor 5=Other (Specify)
1. ____(Enter square feet of building)	____ (Enter code)	Total cost to preserve & restore **(in thousands)** $_____,_____,000 Funds set aside to preserve & restore from: (If none, enter 0.) Federal $____,____,000 State $____,____,000 Private $____,____,000 Other $____,____,000	**(Check all that apply)** 1 __ 4 __ 2 __ 5 __ 3 __ 6 __ 7 __ _____	a _____ b _____ c ( ) _____ d ____ (Enter code from above)

Section 3. Please list any other properties that have not been identified in either Section 1 or 2.

Name and Type of Property (b)=Building (si)=Site (st)=Structure (o)=Object **If the property is a building, please provide the square footage.**	**(a)** Is the property owned **and/or** still existing? 1=Yes, both owned and still exists **(Enter 1 below, then complete b, c, and d of this section)** - - - - - - - - - - - - - - - - - - 2=Yes, both owned and exists, but will be destroyed 3= Never or no longer owned, but still exists 4= No longer exists (Please describe what happened to the property) **(If 2, 3 or 4, then enter code below and STOP Do not complete columns b, c and d for these properties)**	**(b)** Estimated total cost to preserve & restore. Please provide only the estimated cost to be spent after 6/1/97. Please provide only capital expenditure costs and not operating and maintenance costs. Of the total cost estimated below, specify the source and amount of funds, if any, that have been set aside from each source.	**(c)** How was the estimate calculated? 1=Original feasibility report 2=Updated feasibility report 3=Actual contractor quotations or contractor proposals 4=Cost estimating guidebook 5=Cost per square foot 6=Consumer Price Index (CPI) inflator 7=Other (specify below)	**(d)** Principal preparer of latest cost estimate. a. Name b. Title c. Telephone number d. Credentials of preparer (Enter code listed below) 1=Outside architect/engineering firm 2=In-house or school architect/engineer 3=Contractor - other than architect/ engineering firm 4=School building/maintenance supervisor 5=Other (Specify)
1. _____(Enter square feet of building)	____ (Enter code)	Total cost to preserve & restore **(in thousands)** $_____,_____,000 Funds set aside to preserve & restore from: (If none, enter 0.) Federal $____,____,000 State $____,____,000 Private $____,____,000 Other $____,____,000	**(Check all that apply)** 1. ___ 4. ___ 2. ___ 5. ___ 3. ___ 6. ___ 7. ___ _____	a. _____ b. _____ c. ( )_____ d. _____ (Enter code from above)

Comments From the Department of the Interior

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

JAN 12 1998

Mr. Barry T. Hill
Associate Director, Energy, Resources and Science Issues
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Hill:

The Department of the Interior has reviewed the Draft Report prepared by the Resources, Community, and Economic Development Division of the General Accounting Office (GAO), entitled, "Historic Preservation: Cost to Restore Historic Properties at Historically Black Colleges and Universities," (GAO/RCED-98-51).

This report contains data collected by GAO at the request of the Congressional Black Caucus. The report does not contain any recommendations, however, we have enclosed a few comments on the findings and data included in the report.

The Department of the Interior recognizes the existence of highly significant historic properties on Historically Black College and University (HBCU) campuses. These are important national historic treasures worthy of our care and attention. It should be noted, however, that the magnitude of the self-reported repair cost estimates is substantial in terms of the limited level of the appropriations from the Historic Preservation Fund for matching grants to State Historic Preservation Offices and Indian Tribes, as well as grants to HBCUs made available pursuant to Section 507 of the Omnibus Parks and Public Lands Management Act of 1996. Another factor for consideration is that funding for increased appropriations for grants to HBCUs would be subject to authorization and the budgetary controls imposed under the Omnibus Budget Enforcement Act of 1990, as amended.

We appreciate the opportunity to review and comment on the Draft Report.

Sincerely,

For Donald J. Barry
Assistant Secretary for Fish and Wildlife and Parks

Enclosure

Enclosure

COMMENTS ON DRAFT REPORT ON THE COST TO RESTORE HISTORIC PROPERTIES AT HBCUs (GAO/RCED-98-51)

Now on p. 1.
See comment 1.

1 In the first paragraph of the "Results in Brief" on page 2 of the Report, change "an official list of sites, buildings . . . " to "the official list of . . . "

Now on p. 2.
See comment 2.

2 Make the following revisions to the first footnote on page 3: change "specific properties" to "individual properties", correct the typographical error in line four by changing "idenfify" to "identify", and on the last line change "within the district" to "of the district."

See footnote 1 on p. 3.
See comment 3.

3 For clarity, add the following statement to the second footnote on page 3: "Currently, there are NPS-approved State Historic Preservation Programs in all states."

Now on p. 3.
See comment 4.

4 On page 4, all seven aspects of how NPS judges whether a property possesses historical and/or architectural integrity should be cited. Accordingly, revise the second sentence in the middle paragraph to read: "The criteria for evaluating properties include a determination that the property is significant in American history, architecture, archeology, engineering, and culture, and that it possesses integrity of location, design, setting, materials, workmanship, feeling and association." (Additions underlined.)

Now on p. 4.
See comment 5.

5 On page 6, reword the second sentence as follows: "A building may be, for example, a dormitory, gymnasium, house, chapel, or other construction created principally to shelter any form of human activity."

Now on p. 8.
See comment 6.

6 Pages 8 and 9 of the Draft Report stipulate that the HBCUs identified 183 properties that were not listed on the National Register, and had not been surveyed by the State Historic Preservation Office (SHPO) and assessed to be eligible for the National Register by the SHPO. Such properties would not be eligible for Federal grant assistance under the terms of the National Historic Preservation Act (Public Law-89-665), nor under the provisions of Section 507 of the Omnibus Parks and Public Lands Management Act of 1996 (Public Law 104-333). The cost of repairs for these 183 properties was estimated by the HBCUs at $159 million. Thus, if only currently eligible properties are considered, then the estimated cost of repairs is reduced from $755 million for 712 properties to $596 million for 529 properties. (However, as a result of the GAO inquiry, HBCUs may now be working with SHPOs to have some of these 183 properties nominated or assessed by the SHPO in their state.)

See comment 7.
Now on pp. 10-13
Now on p. 16

Now on p. 11

7 The Department of the Interior concurs with the GAO's discussion on pages 14-18 of the Draft Report regarding the cost estimate methodologies employed by the HBCUs surveyed. We also concur with the admonition mentioned on page 21 that some of the proposed work included in the colleges' estimates may involve work that would not conform to the Secretary's Standards for the Treatment of Historic Properties. (Work not in compliance with the Standards would not be eligible for Federal assistance, an example would be sandblasting brick--which causes degeneration of the historic materials and appearance). At the same time, as discussed on page 15 of the Draft Report, the cost of preservation work on long-neglected buildings can significantly escalate beyond initial estimates when the repair work is begun and unanticipated deterioration is encountered.

GAO's Comments

The following are GAO's comments on the Department of the Interior's letter dated January 12, 1998.

1. We have referred to the National Register in the "Results in Brief" as "the" official list of properties as suggested.

2. We have revised footnote 1 changing "specific" to "individual" properties, correcting the spelling of "identify," and changing the phrase "within the district" to "of the district."

3. We added a sentence to footnote 2 that, according to the Department of the Interior, there currently are National Park Service-approved state historic preservation programs in all states.

4. We revised the text to add "location" and "feeling and association" to the criteria for evaluating properties as suggested.

5. We reworded the definition of a building as suggested.

6. We added text to the report to note that properties that are not listed on the National Register and have not been surveyed by state historic preservation officers and assessed to be eligible for listing on the National Register currently are not eligible for federal grant assistance under existing legislation. As a result, $595.8 million of the $755 million total estimated restoration cost is currently eligible for federal grant assistance.

7. We have made reference to the Department's concurrence with our discussion of the historically black colleges and universities' cost-estimating methodologies in the "Agency Comments" section in the body of the report.

Appendix V

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